

**EXECUTIVE SUMMARY - ENFORCEMENT MATTER**  
**DOCKET NO.:** 2007-0042-EAQ-E   **TCEQ ID:** RN104953203   **CASE NO.:** 32215  
**RESPONDENT NAME:** The Park at Hardy Oak Homeowners Association, Inc.

Page 1 of 2

<b>ORDER TYPE:</b>		
<input checked="" type="checkbox"/> 1660 AGREED ORDER	<input type="checkbox"/> FINDINGS AGREED ORDER	<input type="checkbox"/> FINDINGS ORDER FOLLOWING SOAH HEARING
<input type="checkbox"/> FINDINGS DEFAULT ORDER	<input type="checkbox"/> SHUTDOWN ORDER	<input type="checkbox"/> IMMINENT AND SUBSTANTIAL ENDANGERMENT ORDER
<input type="checkbox"/> AMENDED ORDER	<input type="checkbox"/> EMERGENCY ORDER	
<b>CASE TYPE:</b>		
<input type="checkbox"/> AIR	<input type="checkbox"/> MULTI-MEDIA (check all that apply)	<input type="checkbox"/> INDUSTRIAL AND HAZARDOUS WASTE
<input type="checkbox"/> PUBLIC WATER SUPPLY	<input type="checkbox"/> PETROLEUM STORAGE TANKS	<input type="checkbox"/> OCCUPATIONAL CERTIFICATION
<input checked="" type="checkbox"/> WATER QUALITY	<input type="checkbox"/> SEWAGE SLUDGE	<input type="checkbox"/> UNDERGROUND INJECTION CONTROL
<input type="checkbox"/> MUNICIPAL SOLID WASTE	<input type="checkbox"/> RADIOACTIVE WASTE	<input type="checkbox"/> DRY CLEANER REGISTRATION
<p><b>SITE WHERE VIOLATION(S) OCCURRED:</b> Residential subdivision, located on the northeast corner of Eagle Vail and Hardy Oak Boulevard, San Antonio, Bexar County</p> <p><b>TYPE OF OPERATION:</b> Residential subdivision</p> <p><b>SMALL BUSINESS:</b>    <input checked="" type="checkbox"/> Yes    <input type="checkbox"/> No</p> <p><b>OTHER SIGNIFICANT MATTERS:</b> No complaints were received. There is no record of additional pending enforcement actions regarding this facility location.</p> <p><b>INTERESTED PARTIES:</b> No one other than the ED and the Respondent has expressed an interest in this matter.</p> <p><b>COMMENTS RECEIVED:</b> The <i>Texas Register</i> comment period expired on May 14, 2007. No comments were received.</p> <p><b>CONTACTS AND MAILING LIST:</b>     <b>TCEQ Attorney/SEP Coordinator:</b> None     <b>TCEQ Enforcement Coordinator:</b> Ms. Libby Hogue, Enforcement Division, Enforcement Team 3, MC 149, (512) 239-1165; Mr. Steven Lopez, Enforcement Division, MC 219, (512) 239-1896     <b>Respondent:</b> Mr. Jerrod S. Kinnett, President, The Park at Hardy Oak Homeowners Association, Inc., 126 Lindseys Cove, San Antonio, Texas 78258     Mr. Mike Legg, Vice President, The Park at Hardy Oak Homeowners Association, Inc., 300 East Sonterra Boulevard, Suite 350, San Antonio, Texas 78258     <b>Respondent's Attorney:</b> Not represented by counsel on this enforcement matter</p>		

**VIOLATION SUMMARY CHART:**

VIOLATION INFORMATION	PENALTY CONSIDERATIONS	CORRECTIVE ACTIONS TAKEN/REQUIRED
<p><b>Type of Investigation:</b>  <input type="checkbox"/> Complaint  <input type="checkbox"/> Routine  <input type="checkbox"/> Enforcement Follow-up  <input checked="" type="checkbox"/> Records Review</p> <p><b>Date of Complaint Relating to this Case:</b>  None</p> <p><b>Date of Investigation Relating to this Case:</b>  November 29, 2006</p> <p><b>Date of NOE Relating to this Case:</b> January 4, 2007 (NOE)</p> <p><b>Background Facts:</b> This was a routine record review. One violation was documented.</p> <p><b>WATER</b></p> <p>Failed to provide the required basin certification performed by a Texas licensed professional engineer certifying in writing that the permanent best management practices and measures were constructed as designed [30 TEX. ADMIN CODE §213.5(b)(4)(D)(ii)(II)].</p>	<p><b>Total Assessed:</b> \$2,625</p> <p><b>Total Deferred:</b> \$525  <input checked="" type="checkbox"/> Expedited Settlement  <input type="checkbox"/> Financial Inability to Pay</p> <p><b>SEP Conditional Offset:</b> \$0</p> <p><b>Total Paid to General Revenue:</b> \$2,100</p> <p><b>Site Compliance History Classification</b>  <input type="checkbox"/> High <input checked="" type="checkbox"/> Average <input type="checkbox"/> Poor</p> <p><b>Person Compliance History Classification</b>  <input type="checkbox"/> High <input checked="" type="checkbox"/> Average <input type="checkbox"/> Poor</p> <p><b>Major Source:</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><b>Applicable Penalty Policy:</b> September 2002</p>	<p><b>Corrective Actions Taken:</b></p> <p>1) The Executive Director recognizes that on February 20, 2007, Hardy Oak HOA submitted a written basin certification, generated by a Texas licensed professional engineer that certifies the permanent best management practices and measures were constructed as designed.</p>



# Penalty Calculation Worksheet (PCW)

Policy Revision 2 (September 2002)

PCW Revision November 15, 2006

TCEQ

<b>DATES</b>	<b>Assigned</b>	8-Jan-2007	<b>PCW</b>	12-Jan-2007	<b>Screening</b>	12-Jan-2007	<b>EPA Due</b>	
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## RESPONDENT/FACILITY INFORMATION

<b>Respondent</b>	The Park at Hardy Oak Homeowners Association, Inc.		
<b>Reg. Ent. Ref. No.</b>	RN104953203		
<b>Facility/Site Region</b>	13-San Antonio	<b>Major/Minor Source</b>	Major

## CASE INFORMATION

<b>Enf./Case ID No.</b>	32215	<b>No. of Violations</b>	1	
<b>Docket No.</b>	2007-0042-EAQ-E	<b>Order Type</b>	1660	
<b>Media Program(s)</b>	Edwards Aquifer	<b>Enf. Coordinator</b>	Libby Hogue	
<b>Multi-Media</b>		<b>EC's Team</b>	EnforcementTeam 4	
<b>Admin. Penalty \$</b>	<b>Limit Minimum</b>	\$0	<b>Maximum</b>	\$10,000

## Penalty Calculation Section

**TOTAL BASE PENALTY (Sum of violation base penalties)** **Subtotal 1** \$2,500

### ADJUSTMENTS (+/-) TO SUBTOTAL 1

Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.

**Compliance History** 5% Enhancement **Subtotals 2, 3, & 7** \$125

**Notes** A 5% enhancement is recommended for having one same or similar NOV within the past five years.

**Culpability** No 0% Enhancement **Subtotal 4** \$0

**Notes** Respondent does not meet the culpability criteria.

**Good Faith Effort to Comply** 0% Reduction **Subtotal 5** \$0

	Before NOV	NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		
N/A	X	(mark with x)

**Notes** The Respondent does not meet the good faith criteria.

0% Enhancement\* **Subtotal 6** \$0

Total EB Amounts \$51  
Approx. Cost of Compliance \$1,000  
\*Capped at the Total EB \$ Amount

**SUM OF SUBTOTALS 1-7** **Final Subtotal** \$2,625

### OTHER FACTORS AS JUSTICE MAY REQUIRE

**Adjustment** \$0

Reduces or enhances the Final Subtotal by the indicated percentage. (Enter number only; e.g. -30 for -30%.)

**Notes**

**Final Penalty Amount** \$2,625

### STATUTORY LIMIT ADJUSTMENT

**Final Assessed Penalty** \$2,625

### DEFERRAL

20%

Reduction

**Adjustment** -\$525

Reduces the Final Assessed Penalty by the indicated percentage. (Enter number only; e.g. 20 for 20% reduction.)

**Notes**

Deferral offered for expedited settlement.

### PAYABLE PENALTY

\$2,100

Screening Date 12-Jan-2007

Docket No. 2007-0042-EAQ-E

PCW

Respondent The Park at Hardy Oak Homeowners Association, Inc.

Policy Revision 2 (September 2002)

Case ID No. 32215

PCW Revision November 15, 2006

Reg. Ent. Reference No. RN104953203

Media [Statute] Edwards Aquifer

Enf. Coordinator Libby Hogue

## Compliance History Worksheet

## &gt;&gt; Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Enter Number Here	Adjust.
NOVs	Written NOVs with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	1	5%
	Other written NOVs	0	0%
Orders	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	0	0%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgments or consent decrees meeting criteria)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%
Emissions	Chronic excessive emissions events (number of events)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	0	0%
Please Enter Yes or No			
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 5%

## &gt;&gt; Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

## &gt;&gt; Compliance History Person Classification (Subtotal 7)

Average Performer

Adjustment Percentage (Subtotal 7) 0%

## &gt;&gt; Compliance History Summary

Compliance History Notes

A 5% enhancement is recommended for having one same or similar NOV within the past five years.

Total Adjustment Percentage (Subtotals 2, 3, &amp; 7) 5%

Screening Date 12-Jan-2007

Docket No. 2007-0042-EAQ-E

PCW

Respondent The Park at Hardy Oak Homeowners Association, Inc.

Policy Revision 2 (September 2002)

Case ID No. 32215

PCW Revision November 15, 2006

Reg. Ent. Reference No. RN104953203

Media [Statute] Edwards Aquifer

Enf. Coordinator Libby Hogue

Violation Number 1

Rule Cite(s)

30 Tex. Admin. Code § 213.5(b)(4)(D)(ii)(II)

Violation Description

Failed to provide within 30 days of site completion certification in writing that the permanent best management practices (BMP) and measures were constructed and function as designed. Specifically, during the November 29, 2006 file review, the required basin certification had not been provided to the TCEQ.

Base Penalty \$10,000

## &gt;&gt; Environmental, Property and Human Health Matrix

OR

Release	Harm		
	Major	Moderate	Minor
Actual			
Potential			

Percent 0%

## &gt;&gt; Programmatic Matrix

Falsification	Major	Moderate	Minor
	x		

Percent 25%

Matrix Notes

100% of the requirement was not met.

Adjustment \$7,500

\$2,500

## Violation Events

Number of Violation Events 1

324 Number of violation days

mark only one  
with an x

daily	
monthly	
quarterly	
semiannual	
annual	
single event	x

Violation Base Penalty \$2,500

One single event is recommended.

## Economic Benefit (EB) for this violation

## Statutory Limit Test

Estimated EB Amount \$51

Violation Final Penalty Total \$2,625

This violation Final Assessed Penalty (adjusted for limits) \$2,625

## Economic Benefit Worksheet

**Respondent:** The Park at Hardy Oak Homeowners Association, Inc.  
**Case ID No:** 32215  
**Reg. Ent. Reference No:** RN104953203  
**Media:** Edwards Aquifer  
**Violation No:** 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
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No commas or \$

### Delayed Costs

Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)	\$1,000	12-Feb-2006	20-Feb-2007	1.0	\$51	n/a	\$51

#### Notes for DELAYED costs

Estimated costs for consulting with and obtaining a basin certification from a Texas licensed professional engineer. The date required was the date the required certification was due for submittal to the TCEQ. The final date is the date the respondent returned to compliance.

### Avoided Costs

ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Disposal				0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	\$0

#### Notes for AVOIDED costs

Approx. Cost of Compliance

\$1,000

**TOTAL**

\$51

# Compliance History

Customer/Respondent/Owner-Operator: CN603033978 The Park at Hardy Oak Homeowners Association, Inc. Classification: AVERAGE Rating: 7.00

Regulated Entity: RN104953203 BLK 34 LOT P100 ROW OF EAGLE VAIL ST Classification: AVERAGE Site Rating: 7.00

ID Number(s): EDWARDS AQUIFER REGISTRATION 13-00102303

Location: BASIN AT NE CORNER OF EAGLE VAIL AND HARDY OAK BLVD Rating Date: 9/1/2006 Repeat Violator: NO

TCEQ Region: REGION 13 - SAN ANTONIO

Date Compliance History Prepared: January 09, 2007

Agency Decision Requiring Compliance Enforcement

Compliance Period: January 08, 2002 to January 08, 2007

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Libby Hogue Phone: 512-239-1165

## Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? Yes
2. Has there been a (known) change in ownership of the site during the compliance period? Yes
3. If Yes, who is the current owner? N/A
4. If Yes, who was/were the prior owner(s)? Gordon V. Hartman Enterprises, Inc.
5. When did the change(s) in ownership occur? December 4, 2003

### Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

N/A

- B. Any criminal convictions of the state of Texas and the federal government.

N/A

- C. Chronic excessive emissions events.

N/A

- D. The approval dates of investigations. (CCEDS Inv. Track. No.)

1 01/04/2007 (532492)  
N/A

- E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)

Date: 05/25/2006 (464539)

Self Report? NO

Classification: Minor

Citation: 30 TAC Chapter 213, SubChapter A 213.5(f)(1)(A)(i)

Description: Failure to provide the required notification of construction.

Self Report? NO

Classification: Moderate

Citation: 30 TAC Chapter 213, SubChapter A 213.5(b)(4)(D)(ii)(II)

Description: Failure to provide the required basin certification performed by a Texas licensed professional engineer.

Self Report? NO

Classification: Moderate

Citation: 30 TAC Chapter 213, SubChapter A 213.4(k)

Description: Failure to maintain water quality basin.

- F. Environmental audits.

N/A

- G. Type of environmental management systems (EMSs).

N/A

- H. Voluntary on-site compliance assessment dates.

N/A

I. Participation in a voluntary pollution reduction program.

N/A

J. Early compliance.

N/A

K. Sites Outside of Texas

N/A



# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



**IN THE MATTER OF AN  
ENFORCEMENT ACTION  
CONCERNING  
THE PARK AT HARDY OAK  
HOMEOWNERS ASSOCIATION, INC.  
RN104953203**

§  
§ **BEFORE THE**  
§  
§ **TEXAS COMMISSION ON**  
§  
§ **ENVIRONMENTAL QUALITY**

## **AGREED ORDER DOCKET NO. 2007-0042-EAQ-E**

### **I. JURISDICTION AND STIPULATIONS**

At its \_\_\_\_\_ agenda, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding The Park at Hardy Oak Homeowners Association, Inc. ("Hardy Oak HOA") under the authority of TEX. WATER CODE chs. 7 and 26. The Executive Director of the TCEQ, through the Enforcement Division, and Hardy Oak HOA appear before the Commission and together stipulate that:

1. Hardy Oak HOA operates The Park at Hardy Oak residential subdivision located on the northeast corner of Eagle Vail and Hardy Oak Boulevard in Bexar County, San Antonio, Texas (the "Site").
2. Hardy Oak HOA has committed any other act or engaged in any other activity which in itself or in conjunction with any other discharge or activity causes, continues to cause, or will cause pollution of any water in the state under TEX. WATER CODE ch. 26 or any rule, permit, or order of the Commission.
3. The Commission and Hardy Oak HOA agree that the Commission has jurisdiction to enter this Agreed Order, and that Hardy Oak HOA is subject to the Commission's jurisdiction.
4. Hardy Oak HOA received notice of the violations alleged in Section II ("Allegations") on or about January 9, 2007.
5. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by Hardy Oak HOA of any violation alleged in Section II ("Allegations"), nor of any statute or rule.



6. An administrative penalty in the amount of Two Thousand Six Hundred Twenty-Five Dollars (\$2,625) is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). Hardy Oak HOA has paid Two Thousand One Hundred Dollars (\$2,100) of the administrative penalty and Five Hundred Twenty-Five Dollars (\$525) is deferred contingent upon Hardy Oak HOA's timely and satisfactory compliance with all the terms of this Agreed Order. The deferred amount will be waived upon full compliance with the terms of this Agreed Order. If Hardy Oak HOA fails to timely and satisfactorily comply with all requirements of this Agreed Order, the Executive Director may require Hardy Oak HOA to pay all or part of the deferred penalty.
7. Any notice and procedures, which might otherwise be authorized or required in this action, are waived in the interest of a more timely resolution of the matter.
8. The Executive Director of the TCEQ and Hardy Oak HOA have agreed on a settlement of the matters alleged in this enforcement action, subject to the approval of the Commission.
9. The Executive Director recognizes that on February 20, 2007, Hardy Oak HOA submitted a written basin certification, generated by a Texas licensed professional engineer that certifies the permanent best management practices and measures were constructed as designed.
10. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that Hardy Oak HOA has not complied with one or more of the terms or conditions in this Agreed Order.
11. This Agreed Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Agreed Order, whichever is later.
12. The provisions of this Agreed Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Agreed Order unenforceable, the remaining provisions shall be valid and enforceable.

## **II. ALLEGATIONS**

As operator of the Site, Hardy Oak HOA is alleged to have failed to provide the required basin certification performed by a Texas licensed professional engineer certifying in writing that the permanent best management practices and measures were constructed as designed, in violation of 30 TEX. ADMIN. CODE § 213.5(b)(4)(D)(ii)(II), as documented during a record review conducted on November 29, 2006.

## **III. DENIALS**

Hardy Oak HOA generally denies each allegation in Section II ("Allegations").



#### IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TCEQ that Hardy Oak HOA pay an administrative penalty as set forth in Section I, Paragraph 6 above. The payment of this administrative penalty and Hardy Oak HOA's compliance with all the terms and conditions set forth in this Agreed Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations, which are not raised here. Administrative penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: The Park at Hardy Oak Homeowners Association, Inc., Docket No. 2007-0042-EAQ-E" to:  
  
Financial Administration Division, Revenues Section  
Attention: Cashier's Office, MC 214  
Texas Commission on Environmental Quality  
P.O. Box 13088  
Austin, Texas 78711-3088
2. The provisions of this Agreed Order shall apply to and be binding upon Hardy Oak HOA. Hardy Oak HOA is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the operations referenced in this Agreed Order.
3. This Agreed Order, issued by the Commission, shall not be admissible against Hardy Oak HOA in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Agreed Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
4. This agreement may be executed in multiple counterparts, which together shall constitute a single original instrument. Any executed signature page to this Agreement may be transmitted by facsimile transmission to the other parties, which shall constitute an original signature for all purposes.
5. Under 30 TEX. ADMIN. CODE § 70.10(b), the effective date is the date of hand-delivery of the Order to Hardy Oak HOA, or three days after the date on which the Commission mails notice of the Order to Hardy Oak HOA, whichever is earlier. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties.



## SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

\_\_\_\_\_  
For the Commission

John S. Zeller  
For the Executive Director

7/11/07  
Date

I, the undersigned, have read and understand the attached Agreed Order. I am authorized to agree to the attached Agreed Order on behalf of the entity, if any, indicated below my signature, and I do agree to the terms and conditions specified therein. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I also understand that my failure to comply with the Ordering Provisions, if any, in this order and/or my failure to timely pay the penalty amount, may result in:

- A negative impact on my compliance history;
- Greater scrutiny of any permit applications submitted by me;
- Referral of this case to the Attorney General's Office for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions against me;
- Automatic referral to the Attorney General's Office of any future enforcement actions against me;
- and
- TCEQ seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.

Jenod S. Kinnett  
Signature

03/08/07  
Date

Jenod S. Kinnett  
Name (Printed or typed)  
Authorized Representative of  
The Park at Hardy Oak Homeowners Association, Inc.

President  
Title

**Instructions:** Send the original, signed Agreed Order with penalty payment to the Financial Administration Division, Revenues Section at the address in Section IV, Paragraph 1 of this Agreed Order.

Handwritten text, mostly illegible due to extreme fading. The text appears to be organized into several paragraphs or sections, with some lines being more distinct than others. The ink is very light, making it difficult to discern specific words or sentences.

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